



CAPCOA ENGINEERING MANAGERS COMMITTEE MEETING MINUTES

February 12, 2018: 10:00 am to 5:00 pm

February 13, 2018: 8:30 am to 12:00 pm

San Diego County Administration Center (6th Floor Conference Room)

[HYPERLINK

"https://www.google.com/maps/place/1600+Pacific+Hwy,+San+Diego,+CA+92101/@32.7219487,-117.1742964,17z/data=!3m1!4m5!3m4!1s0x80d954ad67ff9797:0xcafdc4563f46749b!8m2!3d32.7219487!4d-117.1721077"]

Call in number: (913) 312-9372; Passcode: 398292

MONDAY, February 12, 2018 (10:00 am – 5:00 pm)

Part 1 – Administrative Business

1.1. Volunteer to Take Minutes: David Lusk volunteered to take minutes.

1.2. Introductions/Attendance List

In Attendance:

Arnaud Marjollet (Chair), San Joaquin Valley APCD
Jim Swaney (Vice Chair), San Diego County APCD
David Lusk, Butte County AQMD
Jorge DeGuzman, Sacramento Metro AQMD
Laki Tisopulos, South Coast AQMD
Kerby Zozula, Ventura County APCD
Ben Beattie, Yolo-Solano AQMD
Gerardo Rios, USEPA
Alan Abbs, CAPCOA (Mon)

By Phone:

Mike Goldman, Santa Barbara County APCD
Mary Giraudo, Monterey Bay ARB
Alam Mangat, Feather River AQMD
Tung Le, ARB (Mon)
Carol Allen, Bay Area AQMD (Tues)
Barry Young, Bay Area AQMD (Tues)
Lisa Peterson, El Dorado AQMD (Tues)
Emmanuel Orozco, Placer County APCD (Tues)
Steve Moore, San Diego County APCD (Tues)
Doug Irvin, San Diego County APCD (Tues)
Chris Gallenstein, ARB (Tues)
Dave Edwards, ARB (Tues)

1.3. Additions/Changes to Agenda: There were no requested changes to the agenda and only minor changes to the minutes.

1.4. Confirmation of upcoming meetings for 2018: The meeting for the end of July was moved to mid-August and from Bay Area to Davis due to cost of hotel accommodations. Symposium dates and locations are still pending.

Date	Host	Location: Room/Address
April 23-24, 2018	San Joaquin Valley APCD	1990 E Gettysburg Ave, Fresno
August 20-21, 2018	Yolo-Solano AQMD	1947 Galileo Court, #103, Davis
October 29-31, 2018 (TBC)	Northern Sonoma	Santa Rosa (Symposium)

- 1.5. Review of Action Items: (Table Updated). For training, Kerby Z. will work with ARB and other districts to develop an Oil and Gas GHG training. Jorge D. compiled the ACI permit list and placed on CAPCOA website under Engineering Managers Documents. Discussion on Title V conditions for noticing. Kerby Z and David L discussed Symposium planning later in the meeting and were tasked with developing proposals and email out for comment.

Part 2 – ARB Updates

- 2.1. E-Noticing update: Tung Le reported that the e-Noticing Advisory to address SB288 questions related to publishing notice in the newspaper versus electronic venues was finalized and would be distributed via Arnaud. If anyone has any further concerns, contact Tung before Friday, 2/16.
- 2.2. ERC Transaction Report: Tung Le reported Steve Eve had retired and Duc Tran was the ARB staff that would be generating the ERC Transaction Submittal request.
- 2.3. CARB Organizational Changes Updates: Tung Le reported on recent ARB staffing changes which included Karen Magliano officially in charge of AB617 activities and that Michael Benjamin was selected to replace her as the Division Chief of AQPS.
- 2.4. Landfill regulations and 40 CFR Subpart Cf – Rule vs Equivalency: Tung Le explained that EPA had not responded to the equivalency request determination and CARB was unsure of what districts were to do since the stay had expired. Gerardo R. explained that he did not foresee an issue since the request was pending and the Landfill Regulations were already implemented.
- 2.5. Other Topics/Updates: Tung Le discussed staffing changes. David Mallory was heading up the Organics Diversion group and working with Alan Abbs on a white paper discussing issues. In discussion, the group discussed regulatory offset provisions like for the early co-gen facilities (HSC 42314). Brian Clerrico will be the rules review contact.

Part 3 – General CAPCOA Updates

- 3.1. AB 617 Overview: Alan Abbs briefed the committee on AB617 activities and workgroups. Community Monitoring: CARB recently released draft nomination guidelines, with public release expected early April. Initial communities to be identified by the end of April, with a full review by the end of July. Official community selection by October 2018. CARB expects districts may have to help public complete nominations. Expect about 30 nominations that will be narrowed to 6-10 for implementation. Goal additional monitoring network for hazard ID. Monitoring may be to sensor/personal monitor level.
Emissions Inventory: CARB in process of creating uniform reporting system. Dave Edwards heading workgroup and currently visiting districts to determine interface needs and understand process. (more detail to be reported by Dave E. on Tues.)
BARCT: Requires GHG BARCT for GHG MR facilities (more by Chris G. ARB on Tues.)

Alan A. discussed funding with a majority going to large districts as the key EJ communities are expected to be there. Funding also allocated toward mobile source issues.

- 3.2. Composting Permitting: Alan reviewed the SB 1383 history which requires 75% diversion of organics from landfills. CalRecycle, CARB, and CAPCOA developing a White Paper to identify issues and possible solutions. Comment to include addressing CEQA.
- 3.3. GHG Rx Status: Alan reported this program was going dormant until need arises. One of the carbon registry organizations was developing a reserve for CEQA type needs.
- 3.4. Other Topics/Updates: Alan A. noted high incentive funding year and need to spend funding quickly to demonstrate need. Current incentive funding subject to annual budget process and not guaranteed to recur. Alan reported CAPCOA creating an IT Committee to assist in IT related issues.

Part 4 – EPA Updates

Gerardo Rios began by sharing a three year work plan to address SIP approval backlog. Plan was emailed to the group. Gerardo discussed conditional approvals would be considered under this administration. Districts with rules that had deficiencies could commit to fixing the rules within 18 months and be given a conditional approval. For districts with older rules in the pipeline that have since been amended and resubmitted, he recommended withdrawing those older rules.

- 4.1. Regulatory Updates: Gerardo reviewed a handout of key regulatory updates, including the municipal landfill regulation status and rescinding the “once in, always in” policy for sources that were a major source of HAPs. (see handout)
- 4.2. NSR Rule Making: Gerardo reported limited activity.
- 4.3. Title V Program Evaluation: Gerardo explained that the first round of evaluations were complete and Region 9 was considered a limited review of past programs to see if implemented measures were still in place. Probably will begin in AZ.
- 4.4. Electronic Submittal Update: Gerardo had a slide presentation on new system to submit Title V documents and other submittals. The Electronic Permit Submittals will allow district staff to submit electronically and track status, and eventually allow public to access documents. See presentation for access details.
- 4.5. NSPS Oil and Gas – EPA’s implementation vs delegation to Districts: Gerardo discussed some delegations required additional requests similar to that for ACI exemption determinations, while other NESHAPs delegations are more automatic.
- 4.6. Other Topics/Updates: Discussion on current EPA staffing (Doris Lo is the new Rulemaking Chief replacing the retired Andrew Steckel). For Tribal NSR permitting, Gerardo expects the general permit for GDFs to be completed by the end of the year.

TUESDAY, February 13, 2018

Part 5 – District / ARB: Topics of Discussion

- 5.1. CARB Centralized Databases in Relation to AB 617 Requirements

- a. BACT Chris Gallenstein briefed the committee on CARB activities to implement the requirements of the bill. The process goal is to have a transparent and clear process for determining BACT and BARCT requirements. Chris asked districts to continue to provide BACT and BARCT updates.
- b. BARCT: Chris G. continued discussion on BARCT explaining a two phase process. Phase I will have all BARCT rules compiled by end of February. He asked district to submit rules to him by then if haven't done so. Phase II includes review and determining advancements: Zero and near Zero technologies, Emissions inventory and monitoring. CARB anticipates analyzing and developing the "gold" standard for BARCT. Strategy due by October 1. Workgroup meeting planned for 2/15 to review rule list.
- c. Emissions Reporting: David Edwards is managing the Emission Inventory workgroup and CARB outreach. His team is currently having 1 on 1's with districts to get acclimated with district procedures and existing processes. Discussed applicability and possibility of web-based facility reporting tools. Expected to expand on existing HARP2 and upgrade CEIDARS. Goal is a standardized methodology and expect to have concepts in a few weeks. Timeline for this part of the process is to develop phase I regulation by late 2018. For "elevated" prioritization score question, Dave E. stated would be based on a combination of information and the new regulation would need to define this new term. He expects this will be a screening process with District review.

Part 6 – District: Topics of Discussion

- 6.1. Oil and Gas Regulation: Arnaud M. discussed SJV rule approval to implement the regulation. SJV worked with CARB to develop registration spreadsheets. Currently have about 85 out of expected 200 facilities reporting. SJV passed a fee rule to supplement funding. Arnaud will send copy of registration document. Discussion on fees from several districts. Mike Goldman reported Santa Barbara APCD had completed almost all of their registration/permitting, determination of critical components, and bringing in several types of components and activities previously not regulated.

About 8 districts have signed MOAs with CARB to implement the Oil and Gas GHG Regs. Completed MOAs can be found here: [[HYPERLINK "https://www.arb.ca.gov/cc/oil-gas/memoranda.htm"](https://www.arb.ca.gov/cc/oil-gas/memoranda.htm)].

- 6.2. Cannabis Related Activities: Permit or not Permit: Arnaud led discussion with survey presentation compiled by Amy Roberts (SacMetro). Discussion on activities in each district and permitting issued (ag vs industrial, odors, processing). Distributive generation regs require "exclusively" for ag so may be some determinations necessary. SB700 would be triggered if ½ major source threshold. Caution to ensure no federal funds are expended in relation to permitting activities.
- 6.3. ATC issuance vs CEQA Status: David Lusk had an email request to provide documentation on whether ATC had to wait until end of CEQA process before

issuance. Many district rules require the CEQA process to be completed first, but permits can be processed concurrently. Government Code §65920 (et.seq.) and specifically Govt. Code §96952 require responsible agencies to not issue authorizations until the lead agency has completed the CEQA process.

Part 7 – Training: (10:45 am to 11:00 am)

- 7.1. CAPCOA/ARB Training: Kerby discussed need for training and working with CARB Enforcement to develop some basic Oil and Gas training. He recommended using Santa Barbara's Oil and Gas page as a training reference ([[HYPERLINK "https://www.ourair.org/oil-and-gas/"](https://www.ourair.org/oil-and-gas/)]). Several districts expressed interest in interactive (classroom) type training for the requirements of the O&G Reg. Kerby will follow up with Leisa Bush at CARB now that Bruce Oulrey has retired.
- 7.2. Symposium Planning: Arnaud asked for feedback on past year's Symposium and suggestions for this year. Comments included that it was too large and attendees tended to not mingle (clumped by districts); needed more opportunity to mix up groups. Liked two track approach. Suggested to include a compliance segment in this next year instead of trying to merge committees into one Symposium. Other topics: AB617, Cannabis updates, more forum type discussions for sharing.

David and Kerby discussed possible venues. The Flamingo in Santa Rosa was only available 11/11-13/18 but those attending the meeting discouraged holiday travel. David and Kerby were to do research on possible venues (Folsom, Santa Rosa, Monterey, Petaluma) for late October and send email to Committee for feedback.

Part 8 – District Update / Issues:

- 8.1. Formaldehyde Emissions from Uncontrolled Landfill and Digester-Fired Engine: Jim Swaney shared two presentations on formaldehyde and arsenic emissions from landfill and digester gas engines that were presented to the NAACA Air Toxics Committee. Emissions factors are higher than AP-42 and revision process lengthy. Expect 0.15 lbs Formaldehyde per 1 lb. of CO. Second study on Arsenic found from new landfill (with no siloxane treatment) found combustion of organic arsenic in gas converting to inorganic arsenic. See presentation for details.
- 8.2. Portable ATCM and PERP changes: Jim Swaney noted amended regulations still not effective and 15 day comments not issued. Current version can be accessed from CARB's board day packet at: [[HYPERLINK "https://www.arb.ca.gov/regact/2017/perp2017/perp2017.htm?utm_medium=email&utm_source=govdelivery"](https://www.arb.ca.gov/regact/2017/perp2017/perp2017.htm?utm_medium=email&utm_source=govdelivery)]
- 8.3. Permitting of self-propelled equipment: Arnaud reported still in draft mode, performing outreach to industry.
- 8.4. Power Plant Permitting Updates: No updates.
- 8.5. New BACT Determinations and Unique Permitting Activities: Laki Tisopulos discussed changes to reclaim program to go back to permitting on an emissions unit basis. Much rule work ahead. Working with EPA/CARB to resolve NSR, SB288, etc. issues.

Jorge DeGuzman reported new BACT determination for prime power from 9 ppm to 5 ppm NOx except power generation will remain at 3 ppm NOx.

Jim Swaney reported San Diego working in a pyrolysis project for processing waste paint.

Laki T. also commented that Jillian Wong at SC was working on demonstration for modeling a settling rate of less than 0.02 m/sec.

Kerby Z. reported on a research exemption for a pyrolysis unit and required toxic source testing as a condition of the exemption.

Laki T. reported on extensive source testing of a pyrolysis unit for medical waste and contact him for more information.

Mary Giraudo of Monterey had questions about increased hydrogen sulfide in landfill gas. Facility had operated at 150 ppm for years and recently increase substantially to above 700 ppm. Mary determined must install BACT b/c of increase above trigger levels. Kerby commented on similar issue and due to gypsum wallboard maturing in the waste. Carol Allen, Bay Area, said could also be triggered from sewage sludge.

David Lusk discussed Oroville Dam Spillway repair and permitting rock crushing and concrete plants now that the repairs are approaching 12 months. Original authorizations for portable equipment during emergencies was considered valid because project duration was unknown. Units are powered by large portable diesel generators authorized under permit.

8.6. Roundtable Discussion:

Gerardo Rios discussed the differences between federal and state laws regarding confidential business information. Past issues were resolved but high potential for EPA to request documentation that is considered confidential by state law but would have to release under federal law. Gerardo would like to have more discussion on how future issues may be avoided.